40 CFR 60.195

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021

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40 CFR 60.195 Emission rate of total fluorides from potroom groups

 $E_p = \left[\left(C_s Q_{sd} \right)_1 + \left(C_s Q_{sd} \right)_2 \right] / \left(PK \right) = \left[\frac{\left(C_s Q_{sd} \right)_1}{PK} \right] + \left[\frac{\left(C_s Q_{sd} \right)_2}{PK} \right] = \left(E_p \right)_1 + \left[\frac{\left(C_s Q_{sd} \right)_2}{PK} \right]$ = Emission rate of total fluorides from a potroom group 1.4 lbs/ton E_{p} 1.1 lbs/ton (Es)2 = Emission rate of total fluorides from a secondary control system or roof monitor effluent gas $(E_p)_1$ = Emission rate of total fluorides for primary control system effluent 0.176 lbs/ton gas $(C_s)_2$ = Concentration of total fluorides from secondary control system or 0.020 mg/SCF roof monitor effluent gas = Average volumetric flow from roof monitor at standard conditions Q_{sd} 236,378,265 SCF/hr on a dry basis = Aluminum production rate 9.58 ton/hr 453,600 mg/lb K = Conversion factor 1 = Subscript for primary control system effluent gas 2 = Subscript for secondary control system or roof monitor effluent gas Emission rate of total fluorides from sample duct as shown in ERT Calculations do not include the volumetric flow from the roof monitor. These are the numbers calculated in the ERT. (Es)2 = Emission rate of total fluorides from the sample duct 4.15E-04 lbs/ton (Cs)2 = Concentration of total fluorides from secondary control system or 3.07E-04 grains/SCF roof monitor effluent gas (Cs)2 = Concentration of total fluorides from secondary control system or 3.97E-03 lbs/hr roof monitor effluent gas

= Average volumetric flow in the sample duct at standard conditions =

1,507 SCFM

Qsd

on a dry basis

Method 2 and 3 Calculations

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021

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Equation 2-5: Molecular Weight of Stack Gas

$$Ms = Md (1 - Bws) + 18.0 Bws$$

18.0 = Molecular weight of water = 18.0 lb/lb-mole

 M_d = Dry molecular weight of sample gas = 28.83 lb/lb-mole

 B_{obs} = Water vapor in the gas stream, proportion by volume = -0.0017

 M_s = Molecular weight of sample gas/ wet basis = 28.85 lb/lb-mole

Equation 2-6: Absolute stack gas pressure

$$P_s = P_{bar} + \left[\frac{P_g}{13.6} \right]$$

 P_{har} = Barometric pressure at the sampling (or measurement) site = 30.04 in. Hg

 $P_{_{g}}$ = Stack static pressure = -0.54 in. Water

13.6 = Conversion factor (Specific gravity of mercury) = 13.6 in. Water/in. Hg

 P_{c} = Absolute stack pressure (Pbar + Pg) = 30.00 in. Hg

Equation 2-8: Absolute stack temperature

$$Ts = 460 + ts$$

 t_s = Stack temperature = 69.2 deg. F

 $T_{\rm s}$ = Absolute stack temperature for English = 529.2 deg. R

Equation 2-9: Average Stack Gas Velocity

$$v_s = K_p C_p \sqrt{\Delta p_{avg}} \sqrt{\frac{\left(T_s + 460\right)}{P_s M_s}}$$

 K_p = Velocity pressure constant = $85.49 \frac{ft}{sec} \left[\frac{(lb/lb - mole)(in.Hg)}{(^{\circ}R)(in.H_2O)} \right]^{\frac{1}{2}}$

 C_p = Pitot tube coefficient = 0.84

 M_{\odot} = Wet molecular weight of sample gas, wet basis = 28.9 lb/lb-mole

 P_s = Absolute sample gas pressure = 30.00 in. Hg

 T_c = Average sample gas temperature = 69.2 deg. F

 $\sqrt{\Lambda P}$ = Average square root of velocity head of stack gas = 0.36 in. Water

Method 2 and 3 Calculations

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021 460 = Deg. F to deg. R conversion constant = 460 $v_s = \text{Average stack gas velocity} = 20.04 \text{ ft/sec}$

Equation 2-10: Average Stack Gas Dry Volumetric Flow Rate

$$Q_{sd} = 3600(1 - B_{ws})v_s A \left[\frac{T_{std} P_s}{T_{s(avg)} P_{std}} \right]$$

= Water vapor in the gas stream, proportion by volume -0.002 B_{ws} Average stack gas velocity 20.04 ft/sec \boldsymbol{A} Cross-sectional area of stack 1.25 sq. ft. T_{std} Standard absolute temperature 528 deg. R P_{s} 30.00 in. Hg Absolute stack gas pressure $T_{\mathfrak{s}}$ Absolute stack temperature 529.20 deg. R Standard absolute pressure 29.92 in. Hg Dry volumetric stack gas flow rate corrected to standard 90425.5 dscf/hr Q_{sd} conditions

Equation 3-1: Dry Molecular Weight

Md = 0.440(%CO2) + 0.320(%O2) + 0.280(%N2 + %CO)

$\%CO_2$	 Percent CO2 by volume, dry basis 	=	0.1
% <i>O</i> ₂	 Percent O2 by volume, dry basis 	=	20.8
$\%N_2$ and $\%CO$	 Percent N2 and CO by volume, dry basis 	=	79.2
0.280	= Molecular weight of N2 or CO, divided by 100	=	0.280
0.320	= Molecular weight of O2, divided by 100	=	0.320
0.440	= Molecular weight of CO2, divided by 100	=	0.440
M_{d}	= Dry molecular weight of sample gas	=	28.83 lb/lb-mole

Method 4 Calculations

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021

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Equation 4-1: Volume of water vapor condensed

$$V_{wc(std)} = \frac{(V_f - V_i)\rho_w RT_{std}}{P_{ctd} M_{vi}} = K_1 (V_f - V_i)$$

Equation 4-2: Volume of water vapor collected in silica gel

$$V_{wsg(std)} = \frac{\left(w_f - w_i\right)RT_{std}}{P_{std}M_{w}} = K_2\left(w_f - w_i\right)$$

Equation 4-3: Sample gas volume

$$V_{m(std)} = V_m Y \frac{P_m T_{std}}{P_{std} T_m} = K_3 Y \frac{V_m P_m}{T_m}$$

Equation 4-4: Moisture content

$$B_{ws} = \frac{V_{wc(std)} + V_{wsg(std)}}{V_{wc(std)} + V_{wsg(std)} + V_{m(std)}}$$

K_1	=	0.04707 for English units	=	0.04707	cu. ft./ml
K_2	=	0.04715 for English units	=	0.04715	cu. ft/g
K_3	=	17.64 for English units	=	17.64	deg. R/in. Hg
M_{w}	=	Molecular weight of water	=	18.0	lb/lb-mole
P_m	=	Absolute pressure (for this method, same as barometric pressure) at the dry gas meter	=	30.04	in. Hg
P_{std}	=	Standard absolute pressure	=	29.92	in. Hg
R	=	Ideal gas constant for English units	=	21.85	(in. Hg)(cu. ft.)/ (lb-mole)(deg. R)
T_{m}	=	Absolute temperature at meter	=	534.81	deg. R
T_{std}	=	Standard absolute temperature	=	528	deg. R
V_{m}	=	Dry gas volume measured by dry gas meter	=	963.31	dcf
$V_{m(std)}$	=	Dry gas volume measured by dry gas meter, corrected to standard conditions	=	957.822	dscf

Method 4 Calculations

Location:	M	1ETHOD 14	Line:	2	F	Run #:	1		Start Date:	1/	12/2021
$V_{wc(std)}$	=	Volume of water v conditions	apor con	densed cor	rected to sta	andard		=	-4.65 scf		
$V_{wsg(std)}$	=	Volume of water v standard condition		ected in silid	ca gel corre	cted to		=	3.02 scf		
V_{f}	=	Final volume of co	ndenser	water				=	2162.10 ml		
V_{i}	=	Initial volume of co	ndenser	water				=	2260.90 ml		
w_f	=	Final weight of silic	ca gel					=	1175.10 g		
w_i	=	Initial weight of sili	ca gel					=	1111.10 g		
$B_{\scriptscriptstyle ws}$	=	Water vapor in the	gas stre	am, propor	tion by volur	me		=	-0.0017 =	-0.17	%

Method 5 Calculations

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021

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Equation 5-1: Volume of Dry Gas in Cubic Feet Sampled corrected to Standard Conditions, (dscf)

$$V_{m(std)} = K_1 V_m Y \frac{\left[P_{bar} + \frac{\Delta H}{13.6} \right]}{\left(460 + T_m \right)}$$

= Barometric pressure at the sampling (or measurement) site 30.04 in. Hg P_{bar} Absolute average DGM temperature 74.8 deg. F = Dry gas volume measured by the dry gas meter 963.315 dcf 0.998 Y Dry gas meter calibration factor (dimensionless) ΛH = Average pressure differential across the orifice meter 1.62 in. Water 17.647 deg. R/in. Hg = Standard temperature to pressure ratio (528/29.92) K_1 13.6 = Conversion factor (Specific gravity of mercury) 13.6 in. Water/in. Hg 460 = Conversion factor (deg. F to deg. R) 460 = Dry gas volume measured by the dry gas meter, corrected to 957.822 dscf standard conditions

Equation 5-2: Volume of Water Vapor Condensed, (scf)

$$V_{w(std)} = \frac{V_{lc} \rho_w R T_{std}}{M_w P_{std}} = K_2 V_{lc}$$

 V_{lc} = Total Volume of liquid collected in impingers and silica gel = -34.8 ml K_2 = Ideal gas conversion factor (cu. ft. water vapor/ml) = 0.04707 cu. ft./ml $V_{w(std)}$ = Volume of water vapor in the gas sample, corrected to = -1.6 cu. ft.

Equation 5-3: Moisture Content, (dimensionless)

$$B_{ws} = \frac{V_{w(std)}}{V_{m(std)} + V_{w(std)}}$$

 $V_{m(std)}$ = Dry gas volume measured by the dry gas meter, corrected to standard conditions = 957.822 dscf $V_{w(std)}$ = Volume of water vapor in the gas sample, corrected to standard conditions = -1.64 scf $V_{w(std)}$ = Water vapor in the gas stream, proportion by volume = -0.0017 = -0.17 %

Method 5 Calculations

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021

Equation 5-4: Acetone Blank Concentration

$$C_a = \frac{m_a}{V_a \rho_a}$$

Equation 5-5: Acetone Wash Blank

$$W_a = C_a V_{aw} \rho_a$$

C_a	 Acetone blank residue concentration 	=	2.5E-06	mg/mg
m_a	= Mass of residue of acetone after evaporation	=	0.40	mg
V_a	 Volume of acetone blank 	=	200.0	ml
$ ho_a$	 Density of acetone (see label on bottle) 	=	785.2	mg/ml
W_a	 Weight of residue in acetone wash 	=	2.5E-01	mg
V_{aw}	 Volume of acetone used in wash 	=	125.00	ml

Equation 5-6: Particulate concentration

$$c_s = (0.001 g / mg)(m_n / V_{m(std)})$$

= Percent of Isokinetic sampling (train to duct)

 c_s = Concentration of particulate matter in stack gas, dry basis, = 0.0000501 g/dscf corrected to standard conditions

 m_n = Total amount of particulate matter collected = 47.95 mg

Equation 5-7: Percent of Isokinetic sampling

Ι

$$I = \frac{100T_{s} \left[K_{3}V_{lc} + \left(V_{m}Y / T_{m} \right) \left(P_{bar} + \Delta H / 13.6 \right) \right]}{60 \Theta v_{s} P_{s} A_{n}}$$

 $K_3 = 0.002669$ for English units = 0.002669 (in. Hg)(cu.ft.) / (ml)(deg. R)

98.01

=

%

 Θ = Total sampling time = 1395.00 min. v_s = Average stack gas velocity = 20.04 ft/sec

 T_s = Absolute average stack gas temperature = 529.2 deg. R

 P_s = Absolute stack gas pressure = 30.04 in. Hg

 A_n = Cross-sectional area of nozzle = 0.000581 sq. ft.

Method 5 Calculations

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021

Equation 5-8: Percent of Isokinetic sampling calculation from Intermediate values

$$I = \frac{100T_{s}V_{m(std)}P_{std}}{60T_{std}v_{s}\Theta A_{n}P_{s}(1 - B_{ws})} = \frac{K_{4}T_{s}V_{m(std)}}{P_{s}v_{s}A_{n}\Theta(1 - B_{ws})}$$

I = Percent of Isokinetic sampling (train to duct) = 98.01 %

 K_4 = 0.09450 for English units = 0.09450 (in. Hg)(cu.ft.)/(ml)(deg. R)

 Θ = Total sampling time = 1395.00 min. v_s = Average stack gas velocity = 20.04 ft/sec

Emission rate of Particulate in lbs/hr

$$E_p = \frac{c_s}{7000} Q_{sd}$$

c_s	 Concentration of particulate matter in stack gas, dry basis, corrected to standard conditions 	=	0.000880	grains/dscf
Q_{sd}	 Dry volumetric stack gas flow rate corrected to standard conditions 	=	90426	dscf/hr
7000	= Conversion factor	=	7000	grains/lb
E_{p}	= Emission rate of particulate	=	29.71	lb/hr
	= Emission rate of particulate	=	3.10	lb/ton

Method 13A Calculations

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021

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Equation 13A-1 (Gaseous): Gaseous fluoride in sample

$$F_g = 10^{-3} \frac{V_g}{A_g} \frac{V_{gd}}{A_{gd}} (\mu g \ F)$$

= Total volume of gaseous F sample, after final dilution 1000 ml = Volume of gaseous distillate as diluted 250 ml A_{ρ} = Aliquot of gaseous sample added to still 50 ml = Aliquot of gaseous distillate taken for color development 25 ml A_{gd} $\mu g F$ = Concentration from the calibration curve 42.0 ug F_{g} = Gaseous F in sample 12.31 mg

Equation 13A-1 (Particulate): Particulate fluoride in sample

$$F_p = 10^{-3} \frac{V_p}{A_p} \frac{V_{pd}}{A_{pd}} (\mu g F)$$

 V_{p} = Total volume of gaseous F sample, after final dilution 100 ml = Volume of gaseous distillate as diluted 250 ml = Aliquot of gaseous sample added to still A_p 10 ml = Aliquot of gaseous distillate taken for color development A_{nd} 15 ml μg F = Concentration from the calibration curve 43.4 ug = Particulate F in sample 6.77 mg

Equation 13A-1: Total fluoride in sample

$$F_t = F_g + F_p$$

 F_t = Total F in sample = 19.08 mg

Equation 13A-2: Fluoride concentration in stack gas

$$C_s = \frac{F_t}{V_{m(std)}}$$

 $V_{m(std)}$ = Dry gas volume measured by the dry gas meter, corrected to standard conditions = 27.126 SCM standard conditions = 0.703 mg/SCM

Method 14 Calculations

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021

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Equation 14-1: Velocity in duct at sampling location

Since the duct at the sampling location is rectangular instead of circular, equation 14-1 must be modified to obtain equation 14-1m.

$$v_d = \frac{8(D_n)^2}{(D_d)^2} (v_m) \frac{1 \min}{60 \sec}$$

Equation 14-1m: Velocity in duct at sampling location modified for rectangular sampling duct and in ft/min

$$v_d = \frac{\left(8 \pi D_n^2\right)/4}{A_d} \left(v_m\right)$$

 v_d = Velocity in duct at sampling location = 833.52 ft/min

 D_n = Diameter of a roof monitor manifold nozzle = 1.5 ft

 A_d = Area of duct at sampling location = 1.25 sq.ft.

$$\frac{\left(8\pi D_n^2\right)/4}{(A_d)} = 11.3097$$

 v_m = Average velocity of the air stream in the roof monitor as = 73.7 ft/min determined by the anemometer located at the center of the sampling manifold

Equation 2-9: Average Stack Gas Velocity

$$v_s = 60 * K_p C_p \sqrt{\Delta p_{avg}} \sqrt{\frac{(T_s + 460)}{P_s M_s}}$$
 ft/min

$$v_s = K_p C_p \sqrt{\Delta p_{avg}} \sqrt{\frac{\left(T_s + 460\right)}{P_s M_s}}$$
 ft/sec

 v_s = Average stack gas velocity = 1202.37 ft/min

 v_s = Average stack gas velocity = 20.04 ft/sec

 K_p = Velocity pressure constant = $85.49 \frac{ft}{sec} \left[\frac{(lb/lb - mole)(in.Hg)}{(^{\circ}R)(in.H_2O)} \right]^{\frac{1}{2}}$

 C_p = Pitot tube coefficient = 0.84

 M_s = Wet molecular weight of sample gas, wet basis = 28.9 lb/lb-mole

 $P_{\rm c}$ = Absolute sample gas pressure = 30.00 in. Hg

 t_c = Average sample gas temperature = 69.2 deg. F

 $\sqrt{\Lambda P}$ = Average square root of velocity head of stack gas = 0.36 in. Water

460 = Deg. F to deg. R conversion constant = 460

Method 14 Calculations

Location: METHOD 14 Line: 2 Run #: 1 Start Date: 1/12/2021

Isokinetic Sampling Check

 \boldsymbol{A}

% Isokinetic (Manifold to Roof) =
$$\frac{v_s P_s(t_m + 460)}{v_d P_m(t_s + 460)}$$

% Isokinetic (Manifold to Roof) = 147.74 %

 v_s = Average stack gas velocity (actual) = 1202.37 ft/min v_d = Velocity in duct at sampling location = 833.52 ft/min

Correction Factor for % Isokinetic (Manifold to Roof) greater than 120

$$Correction \ Factor = 1 + \frac{\left(\left[\% \ Isokinetic \left(Manifold \ to \ Roof \right) \right] - 120 \right)}{200}$$

 F_t = Total fluoride = 19.08 mg

 $V_{m(std)}$ = Dry gas volume measured by the dry gas meter, corrected to = 27.126 SCM

standard conditions

Correction factor calculated if % Isokinetic (Manifold to Roof) is = 1.1387

greater than 120

= Roof monitor open area

 c_s = Fluoride concentration in stack gas (uncorrected) = 0.703 mg/SCM

 c_s = Fluoride concentration in stack gas (corrected when % isokinetic = 0.801 mg/SCM

(manifold to roof) is greater than 120%

Equation 14-3: Average volumetric flow from roof monitor at standard conditions on a dry basis

$$Q_{sd} = \frac{V_{mt}M_dP_m(T_{std})A}{(t_m + 460^\circ)(P_{std})}$$
SCFM
$$Q_{sd} = \frac{V_{mt}M_dP_m(T_{std})A}{(t_m + 460^\circ)(P_{std})} *60$$
SCF/hr
$$= \text{Average volumetric flow from roof monitor at standard} = 3939638 \text{ SCFM}$$

Q_{sd} = Average volumetric flow from roof monitor at standard = 3939638 SCFN conditions on a dry basis

 Q_{sd} = Average volumetric flow from roof monitor at standard = 236378265 SCF/hr

conditions on a dry basis

 v_{mt} = Average velocity of air in the roof monitor = 62.7 ft/min

63868 ft^2

 P_m = Pressure in the roof monitor; equal to barometric pressure = 30.00 in. Hg

 t_m = Roof monitor temperature = 80.1 deg. F

 M_d = Mole fraction of dry gas = 1.002

 T_{std} = Standard absolute temperature = 528 deg. R

 P_{std} = Standard absolute pressure = 29.92 in. Hg